

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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: IN RE: WORLD TRADE CENTER LOWER :  
: MANHATTAN DISASTER SITE :  
: LITIGATION :  
: ----- X


21 MC 102 (AKH)  
ECF CASE

THIS DOCUMENT APPLIES TO ALL CASES :  
IN THE WORLD TRADE CENTER LOWER :  
MANHATTAN DISASTER SITE :  
LITIGATION IN WHICH FGP 90 WEST :  
STREET, INC. IS A DEFENDANT :  
----- X

**NOTICE OF MOTION FOR  
PRO HAC VICE ADMISSION OF  
ROBERT J. MATHIAS, ESQ.**

PLEASE TAKE NOTICE that, upon the accompanying declaration of Keara M. Gordon, a member of the bar of this Court, together with the supporting declaration of Robert J. Mathias and the attachments thereto, the undersigned will move this Court, pursuant to Local Civil Rule 1.3(c), before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D of the United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the court, for an order in the form accompanying this motion granting the admission *pro hac vice* of Robert J. Mathias, Esq. as counsel for the defendant FGP 90 West Street, Inc. in this action and granting such other and further relief as the Court may deem just and proper.

Dated: August 23 2007  
New York, New York

  
Keara M. Gordon

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LOWER MANHATTAN DISASTER SITE :	:	
LITIGATION IN WHICH FGP 90 WEST :	:	
STREET, INC. IS A DEFENDANT :	:	
-----	X	


DECLARATION OF KEARA M. GORDON.

Pursuant to 28 U.S.C. § 1746, Keara M. Gordon declares:

1. I am an attorney admitted to practice in this Court and am a member of DLA Piper US LLP, counsel for defendant FGP 90 West Street, Inc. in this action. I make this declaration in support of the motion for admission *pro hac vice* of my colleague Robert J. Mathias.
2. Mr. Mathias is a partner based in the Baltimore office of DLA Piper. As set forth in his accompanying declaration, he is a member in good standing of the Bar of the State of Maryland and the District of Columbia, among other courts. There are no pending disciplinary proceedings against Mr. Mathias in any State or Federal court.
3. I know Mr. Mathias to be of outstanding moral character, and I respectfully move for his admission to practice before the Court for the instant matter.

4. Under penalty of perjury, I declare that the foregoing is true and correct.

Dated: August 23 2007  
New York, New York

  
Keara M. Gordon

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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STREET, INC. IS A DEFENDANT	:	
-----	X	

DECLARATION OF ROBERT J. MATHIAS

Pursuant to 28 U.S.C. § 1746, ROBERT J. MATHIAS declares:

1. I am an attorney admitted to practice in the courts of Maryland and the District of Columbia and a member of DLA Piper US LLP, counsel to defendant FGP 90 West Street, Inc. in the above captioned action. I make this declaration in support of the motion for my admission *pro hac vice* in this litigation pursuant to the Court's Local Civil Rule 1.3(c).
2. I am a member in good standing of the Bar of the State of Maryland and of the District of Columbia. There are no pending disciplinary proceedings against me in any State or Federal court.
3. Attached hereto as Exhibit 1 is a true and correct copy of a certificate of my good standing that was issued within the past thirty days by the Court of Appeals of Maryland.

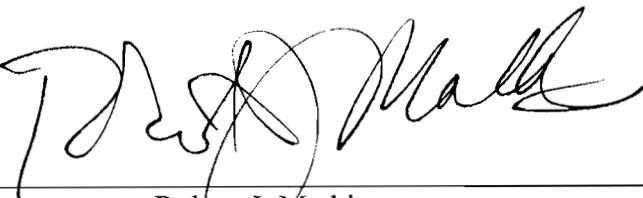
4. Attached hereto as Exhibit 2 is a true and correct copy of a certificate of my good standing that was issued within the past thirty days by the District of Columbia Court of Appeals.

5. My business address is:

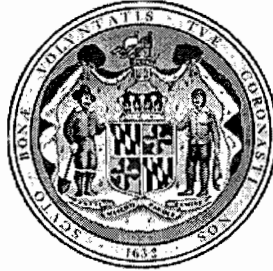
DLA Piper US LLP  
6225 Smith Avenue  
Baltimore, Maryland 21209  
(410) 580-3000 (Telephone)  
(410) 580-3001 (Facsimile)

Under penalty of perjury, I declare that the foregoing is true and correct this

21<sup>st</sup> day of August, 200~~7~~.

  
\_\_\_\_\_  
Robert J. Mathias

**Court of Appeals  
of Maryland**  
Annapolis, MD



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the twentieth day of November, 1980,*

**Robert Joseph Mathias**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
fourteenth day of August, 2007.*

  
Clerk of the Court of Appeals of Maryland



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

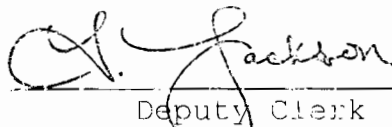
Robert J. Mathias

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was on the 8<sup>th</sup> day of January, 1993  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on August  
15, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

**CERTIFICATE OF SERVICE**

I, Rachel A. Gupta, hereby certify that on August 28, 2007, I caused a true and correct copy of FGP 90 West Street, Inc.'s Notice of Motion for Pro Hac Vice Admission of Robert J. Mathias, Esq., with supporting documents to be served by First Class Mail upon:

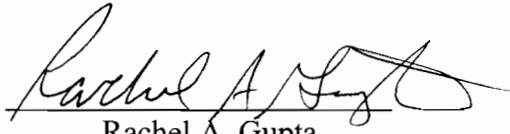
Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12th Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5th Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5th Floor  
New York, New York 10279

Robin Wertheimer, Esq.  
Wertheimer Associates, P.C.  
225 Broadway  
New York, New York 10007

In addition, I hereby certify that on the same day, the motion with supporting papers referenced above was served upon counsel for defendants via electronic mail:

  
Rachel A. Gupta